

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF CITIPOWER, LLC FOR)	CASE NO.
APPROVAL OF REORGANIZATION PROPOSAL)	2004-00444

COMMISSION STAFF'S SECOND DATA REQUEST
TO CITIPOWER, LLC

Pursuant to 807 KAR 5:001, Commission Staff requests that Citipower, LLC ("Citipower") file the original and 6 copies of the following information with the Commission with a copy to all parties of record. The information requested herein is due within 7 days of the date of this data request. Each copy of the information requested should be placed in a bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure its legibility. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information should be provided for total company operations and jurisdictional operations, separately.

1. Refer to Citipower's Response to First Data Request of Commission Staff ("Response to Staff's First Request"), Item 8. Citipower states that Bill Webb will be moved to Citi Energy, LLC ("Citi Energy"), that the responsibility of gas supply will be transferred from Citipower to Citi Energy, and that Citipower will not replace Bill Webb with another employee.

a. Explain what duties Bill Webb performed for Citipower and why Citipower does not plan to hire a replacement.

b. Explain why the responsibility for gas supply is being transferred to Citi Energy and what that responsibility entails.

2. State whether Citipower currently performs any of the operations at the gas wells. If yes, explain what activities Citipower performs, provide the cost information, and state whether these activities will continue after the reorganization.

3. Is Citipower involved in gas compression and transportation for Citi Energy? Explain Citipower's activities and costs related to the compressor station and the transmission line located in the State of Tennessee

4. Refer to Citipower's Response to Staff's First Request, Item 1. Are the two bank accounts listed transferring from Citipower's books?

5. Refer to Citipower's Response to Staff's First Request, Item 2. With the exception of the LBU, LLC Investment and Citigas LLC Investment account reductions, explain how the utility calculated the change in all other accounts affected by the reorganization.

6. Refer to Citipower's Response to Staff's First Request, Item 4. The response states, "[i]n late December, 2004, Forexco repaid all debt owed to Citipower, L.L.C." Will Citipower use this money to pay off the debt of \$250,000 owed to the Bank of McCreary County. If yes, when? If no, why not?

7. Refer to Citipower's Response to Staff's First Request, Item 6. This response states that a Citipower pickup truck is transferring as a result of the reorganization.

a. Provide the original cost of the truck and the accumulated depreciation at December 31, 2004.

b. Is the transfer of the truck and the related accumulated depreciation reflected in the reduction to plant and accumulated depreciation shown in the Response to Staff's First Request, Item 2?

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal line at the end, positioned above the printed name.

Beth O'Donnell
Executive Director
Public Service Commission
P. O. Box 615
Frankfort, KY 40602

DATED March 2, 2005

cc: All Parties